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Counsel to Debtors and Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
ST. CHRISTOPHER'S, INC., <i>et al.</i> , ¹	:	Case No. 24-22373 (SHL)
	:	Main Case
Debtors.	:	Jointly Administered

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' MOTION
FOR ENTRY OF ORDER APPROVING SETTLEMENT AND COMPROMISE
BETWEEN DEBTORS AND IRON MOUNTAIN INFORMATION
MANAGEMENT, LLC PURSUANT TO BANKRUPTCY PROCEDURE 9019**

TO THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

1. Under Rule 9075-2 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (the "Local Rules"), the undersigned counsel for debtors and debtors-in-possession St. Christophers, Inc. and The McQuade Foundation (the "Debtors" or "Movants"), hereby certifies as follows:

2. On April 17, 2025, Movants filed their Motion for Entry of Order Approving Settlement and Compromise Between Debtors and Iron Mountain Information Management, LLC Pursuant to Federal Rule of Bankruptcy Procedure 9019 (Docket No. 214) (the "Motion").

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: St. Christopher's, Inc. (0485) and The McQuade Foundation (2652).

3. Objections or responses to the Motion were due no later than 4:00 p.m. on May 1, 2025 (prevailing Eastern Time) (the “Objection Deadline”). Local Rule 9075-2 provides that a motion may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection deadline and (b) the attorney for the entity that filed the motion or application complies with such rule.

4. The Motion with Notice thereof was filed and served on April 17, 2025 (Docket No. 214-1).

5. As of the filing of this certificate, more than forty-eight (48) hours have elapsed since the Objection Deadline and, to the best of my knowledge, no objection, responsive pleading, or request for hearing with respect to the Motion has been (a) filed with the Court on the docket of the above captioned Chapter 11 case or (b) served on Movant or its counsel.

6. Accordingly, the Movant respectfully requests entry of the proposed order granting the relief requested in the Motion, attached hereto as **Exhibit A** (the “Proposed Order”), at the Court’s earliest convenience. If not entered prior to the hearing, the Movants will seek entry of the Proposed Order at the hearing scheduled for 10:00 a.m. (prevailing Eastern Time) on May 8, 2025, before the Honorable Sean H. Lane, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601.

7. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: May 5, 2025
New York, New York

BARCLAY DAMON LLP

By: /s/Ilan Markus

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EXHIBIT A

(PROPOSED ORDER)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
ST. CHRISTOPHER'S, INC., <i>et al.</i> , ¹	:	Case No. 24-22373
	:	Main Case
Debtors.	:	Jointly Administered

**ORDER APPROVING SETTLEMENT AND COMPROMISE
BETWEEN DEBTORS AND IRON MOUNTAIN
INFORMATION MANAGEMENT, LLC PURSUANT
TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019**

Upon the Motion (the “Motion”)² of the above captioned debtors and debtors-in-possession (the “Debtors”), pursuant to Bankruptcy Code sections 105(a) and 363 and Bankruptcy Rule 9019(a) approving the settlement between St. Christopher’s, Inc. (the “Debtor”) and Iron Mountain Information Management, LLC (“Iron Mountain” and, together with the Debtor, the “Parties”); and the Court having subject matter jurisdiction to consider and determine the Motion, and grant the requested relief in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409 and it appearing that due and sufficient notice of the Motion has been given and upon the record of the hearing on the Motion and all of the proceedings had before this Court; and all objections to the Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, now, therefore, it is hereby

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: St. Christopher’s, Inc. (0485) and The McQuade Foundation (2652).

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

ORDERED, that the Motion is granted as set forth herein; and it is further

ORDERED, that the Agreement, which was attached as Exhibit 1 to the Motion, be and hereby is authorized and approved in its entirety in all respects; and it is further

ORDERED, that the Debtor is authorized to consummate the Agreement; and it is further

ORDERED, that all of the terms set forth in the Agreement, including the agreements, releases, terms and conditions of the Agreement, are deemed binding on the Parties thereto; without limitation, the releases by the Parties to the Agreement are authorized and approved by the Court as set forth in the Agreement; and it is further

ORDERED, that the Parties are authorized to take all actions and execute all documents necessary to implement the Agreement; and it is further

ORDERED, that this Court shall maintain jurisdiction to interpret and enforce the provisions of the Agreement and this Order in all respects; and it is further

ORDERED, that, to the extent applicable, the stay provided for in Bankruptcy Rule 6004(h) is hereby waived and this Order shall be effective immediately upon its entry.

Dated: May ____, 2025
White Plains, New York

Honorable Sean H. Lane
United States Bankruptcy Judge